

**IN THE DISTRICT COURT OF THE VIRGIN ISLANDS  
DIVISION OF ST. CROIX**

UNITED STATES POSTAL SERVICE	)	
FEDERAL CREDIT UNION,	)	
	)	Civil No. 2016-71
Plaintiff,	)	
	)	
v.	)	ACTION FOR DEBT AND
	)	FORECLOSURE OF REAL
VERONICA L. EDWIN, LINK A. EDWIN,	)	
GOVERNMENT OF THE VIRGIN ISLANDS,	)	
and THE UNITED STATES OF AMERICA,	)	
	)	
Defendants.	)	
	)	

**ANSWER OF GOVERNMENT OF  
THE VIRGIN ISLANDS**

COMES NOW Defendant Government of the Virgin Islands (“GVI”), by and through its undersigned counsel, and hereby files its Answer to the First Amended Complaint as follows:

1. This allegation is a conclusion of law and Plaintiff is left to strict proof.
2. Defendant lacks sufficient information to either admit or deny the allegations of this paragraph.
3. Defendant lacks sufficient information to either admit or deny the allegations of this paragraph.
4. Defendant lacks sufficient information to either admit or deny the allegations of this paragraph.
5. Defendant lacks sufficient information to either admit or deny the allegations of this paragraph. In addition, the “Note” is a document that, in and of itself, provides the best evidence of its contents.
6. Defendant lacks sufficient information to either admit or deny the allegations of

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this paragraph. In addition, the “Mortgage” is a document that, in and of itself, provides the best evidence of its contents.

7. Defendant lacks sufficient information to either admit or deny the allegations of this paragraph. In addition, the “Notice of Default” is a document that, in and of itself, provides the best evidence of its contents

8. Defendant lacks sufficient information to either admit or deny the allegations of this paragraph.

9. Admitted.

10. Defendant lacks sufficient information to either admit or deny the allegations of this paragraph.

11. Admitted.

12. Defendant lacks sufficient information to either admit or deny the allegations of this paragraph.

### **DEFENDANT VIBIR’S DEFENSES**

1. GVI’s tax liens attach to all property of the taxpayer, do not merge with the judgment, and can be extinguished only by payment.
2. GVI’s tax liens are valid and enforceable.
3. GVI reserves the right to raise and assert any and all other defenses and affirmative defenses which discovery hereafter may revert to be appropriate.

WHEREFORE, the GVI, having fully answered hereby prays that this Honorable Court:

- (a) determine the relative priority of the liens involved in this action;
- (b) enter a judgment that establishes any indebtedness due to the GVI together with interest and penalties thereon;

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- (c) GVI is entitled to any proceeds of such sale after satisfaction of all prior liens on the property, and
- (d) award any other relief deemed appropriate.

Respectfully submitted,

CLAUDE EARL WALKER  
ATTORNEY GENERAL

DATED: December 6, 2016

By: s/ *Erika M. Scott*

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 6th day of December, 2016, and pursuant to LRCi 5.4.9 and Fed. R. Civ. P. 5(b), a true and exact copy of the foregoing was served through Notice of Electronic Filing (“NEF”) for the following parties and counsel who are Filing Users:

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**BY MAIL:**

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s/ Erika M. Scott  
Erika M. Scott